

MEMO ENDORSED

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February 22, 2008

OF COUNSEL  
HOWARD S. SUSEMAN  
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By fax to (212) 805-6326  
The Honorable Collen McMahon  
United States District Court Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Room 640  
New York, NY 10007

Ref.: EEOC v. Tavern on the Green Ltd. Partnership, 07-CV-8256 (CM/AJP)

Dear Judge McMahon:

We are the outside general counsel for defendant Tavern on the Green Limited Partnership ("Tavern on the Green"). I am writing on consent of all parties and attorneys in this matter.

The parties wish to explore the possibility of a negotiated resolution of the dispute prior to incurring the substantial costs and expenses of the extensive scheduled discovery. To that end, the parties jointly request current deadlines be extended for a period of three weeks and that discovery be stayed for an equivalent three week period. We have scheduled a meeting with the EEOC for Tuesday, February 26, 2008, and will be able to report back to the Court after the parties have been able to discuss a consensual resolution in greater depth. If the parties are not able to resolve the matter, prior to the end of the three week period the parties would submit a revised deposition schedule to the Court.

Pursuant to Paragraph E of your Individual Practices dated February 3, 2006, the current deadlines are: Plaintiff's expert report is due March 14, 2008, defendant's expert report is due April 11, 2008, the end-date for disclosure is April 25, 2008, and the joint pretrial order is due May 23, 2008. The parties respectfully propose extending all these dates by three weeks, so that plaintiff's expert report will be due April 4, 2008, defendant's expert report will be due May 2, 2008, the end-date for disclosure will be May 16, 2008, and the joint-pretrial order will be due June 13, 2008.

No prior requests have been made for any extension, and all parties join in this request.

Very respectfully,



Philip R. Schatz

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OK - adjournment granted

Collen McMahon  
2/25/08

**WROBEL & SCHATZ LLP**

The Honorable Colleen McMahon  
February 22, 2008  
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*Cc: By Fax to 212-805-7933*  
The Honorable Andrew J. Peck  
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Daniel Patrick Moynihan United States Courthouse  
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